

August 26, 2014

Frankie Hampton  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2014 AUG 28 PM 1:54

OFFICE OF GENERAL  
COUNSEL

Re: MUR 6852

Dear Paralegal Hampton:

10044692001

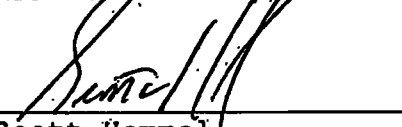
We are writing in response to your letter dated July 9, 2014 regarding a complaint indicating Special Operations for America and or Scott Hommel (collectively "SOFA") may have violated the Federal Election Campaign act of 1971. We believe that the actions of SOFA are in strict compliance with federal law and that the complaint should be dismissed. Please note that Scott Hommel has recently resigned as SOFA's Treasurer; however, Scott has signed the enclosed affidavit in support of this correspondence and SOFA's position.

The basis of the complaint are payments made by SOFA to its vendors and an erroneous presumption of coordination based on use of certain vendors. Without exception, each payment and reimbursement of SOFA has been made for the political purposes of SOFA and not on behalf of or as agent of any candidate or candidate committee. The complaint asserts that SOFA is a single candidate political action committee. However, all of SOFA's publically available information (including the website) and public records of independent expenditures clearly indicate that SOFA supports and opposes multiple candidates across the country.

Please understand that SOFA, at all times, comports its actions and activities in complete compliance with federal election regulations. For these reasons, we request that the complaint against SOFA be dismissed. Please contact Kaarlo Hietala if you have any questions.

Sincerely,

  
Kaarlo Hietala, Treasurer

  
Scott Hommel

Enclosure: Affidavit

cc: Jeff S. Jordan

**Affidavit of Scott Hommel**

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STATE OF NEW JERSEY  
COUNTY OF OCEAN

OFFICE OF GENERAL  
COUNSEL

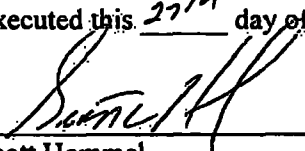
The undersigned, SCOTT HOMMEL, being duly sworn, hereby deposes and says:

1. I am over the age of 18 and am a resident of the State of New York. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I served as Treasurer of Special Operations For America ("SOFA"), an independent expenditure political action committee from November 27, 2012 through August 20, 2014. From June 14, 2012 through August 20, 2014, I oversaw SOFA's day-to-day operations, activities, and expenditures.
4. At all times, while I was Treasurer, SOFA has acted in accordance with federal election laws, rules, and regulations.
5. SOFA has never made an expenditure for a communication that was made in cooperation, consultation or concert with, or at the request or suggestion of any candidate, candidate committee, or a respective agent thereof.
6. SOFA has never made or authorized an expenditure for purposes of distributing or republishing any campaign material produced or prepared by a candidate's campaign.
7. No communication of SOFA has been created, produced, or distributed at the request or suggestion of any candidate, candidate committee, or a respective agent thereof.
8. No candidate or candidate committee has ever been materially involved in decisions regarding the content, intended audience, means or mode of a SOFA communication, specific media outlet used, or the timing or frequency or size or prominence of any SOFA communication.
9. No communication of SOFA has been created, produced or distributed after any discussion about the communication between SOFA or the employees or agents of SOFA and any candidate, candidate's committee, candidate's opponent or an opponent's committee, or any agents of thereof.

10. SOFA has never received any information from a vendor or an agent of a candidate or candidate committee about any plans or needs of a candidate or a candidate's committee.
11. SOFA has never received or used information that was material to the creation, production or distribution of any SOFA communication from a candidate, candidate committee, or a respective agent thereof.
12. SOFA does not have any formal or informal agreement or collaborative arrangement with any candidate, candidate committee, or a respective agent thereof.

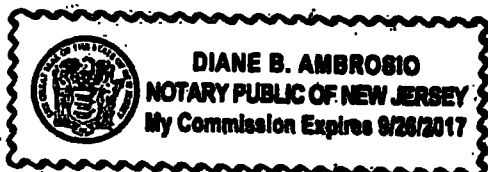
I declare that, to the best of my knowledge and belief, the information herein is true, correct, and complete.

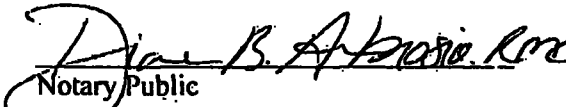
Executed this 27<sup>th</sup> day of August, 2014.

  
\_\_\_\_\_  
Scott Hommel

**NOTARY ACKNOWLEDGEMENT**

STATE OF New Jersey, COUNTY OF Ocean, ss:



  
\_\_\_\_\_  
Notary Public  
\_\_\_\_\_  
Title

My commission expires 9/26/17